UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

PORZIO, BROMBERG & NEWMAN, P.C.

100 Southgate Parkway

P.O. Box 1997

Morristown, New Jersey 07962

(973) 538-4006

Warren J. Martin Jr., Esq. (wjmartin@pbnlaw.com)

Robert M. Schechter, Esq. (rmschechter@pbnlaw.com)

-and-

SHEARMAN & STERLING LLP

2601 Olive St., 17th Floor

Dallas, TX 75201

Telephone: 214.271.5777 Facsimile: 214.853.5005

R. Thaddeus Behrens, Esq. (pro hac vice pending)

(thad.behrens@shearman.com)

Daniel H. Gold, Esq. (pro hac vice pending)

(dan.gold@shearman.com)

Attorneys for Zachary Lee Prince

In re:

Chapter 11

BLOCKFI INC., et al. 1,

Case No. 22-19361 (MBK)

Debtors.

Jointly Administered

APPLICATION FOR PRO HAC VICE ADMISSION OF R. THADDEUS BEHRENS

Please take notice that, pursuant to Fed. R. Civ. P. 78, D.N.J. L. Civ. R. 101.1, and D.N.J. LBR 9010-1, the undersigned respectfully submits this application (the "Application") for the *pro hac vice* admission of R. Thaddeus Behrens, of the law firm of Shearman & Sterling LLP, as

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's federal tax identification number, as applicable, are as follows: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

Case 22-19361-MBK Doc 1165 Filed 07/07/23 Entered 07/07/23 13:36:33 Desc Main Document Page 2 of 2

counsel for Zachary Lee Prince, a creditor and party in interest, in the above-captioned matter and

represents as follows:

1. On November 28, 2022, the Debtors filed voluntary petitions for relief under

Chapter 11 of the Bankruptcy Code, commencing the above captioned Chapter 11 cases in the

United States Bankruptcy Court for the District of New Jersey.

2. R. Thaddeus Behrens, a partner in the firm of Shearman & Sterling, LLP, has been

retained to serve as counsel for Zachary Lee Prince, a creditor and party in interest in connection

with these matters. Because of his familiarity with the facts and circumstances relevant to Mr.

Prince in these matters, Mr. Prince requests that R. Thaddeus Behrens be allowed to appear pro

hac vice in the within matters.

3. As set forth in the Certification of R. Thaddeus Behrens, annexed hereto as Exhibit

A, Mr. Behrens is a member in good standing of the bars of the States of Texas and California.

Mr. Behrens is not under suspension or disbarment by any court.

4. If admitted *pro hac vice*, Mr. Behrens has represented that he will adhere to the

disciplinary jurisdiction of this Court.

WHEREFORE, it is respectfully requested that the Court grant Mr. Prince's Application

pursuant to D.N.J. LBR 9010-1 and L. Civ. R. 101.1(c), to admit counsel pro hac vice in the above

captioned matters.

July 7, 2023

Respectfully submitted,

PORZIO, BROMBERG & NEWMAN, P.C.

/s/ Warren J. Martin Jr.

Warren J. Martin Jr.